

[Counsel Listed on Signature Pages]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No.: 4:22-md-03047-YGR

MDL No.: 3047

This Document Relates to:

**STIPULATION**

Leslie Smith and Jessica Smith

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Member Case No.: 4:23-CV-05632

Plaintiffs Jessica Smith and Leslie Smith (“Plaintiffs”) and Defendants Meta Platforms, Inc. f/k/a Facebook, Inc., Instagram, LLC, Facebook Payments, Inc., Facebook Operations, LLC, Siculus, Inc., Snap, Inc., TikTok Inc., ByteDance Inc., Google LLC, and YouTube, LLC (“Defendants”) in the above-referenced action hereby stipulate to the following: Plaintiffs and Defendants will not offer testimony from Emma Peters in any form (live, by video, in written form, by way of declaration, or through any other means) in connection with summary judgment, other motion practice, at trial, or at any time in connection with this lawsuit.

1 Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

2 Dated: April 1, 2025

By: /s/ Brian Ercole

Brian Ercole (*pro hac vice*)

600 Brickell Avenue, Suite 1600

Miami, FL 33131-3075

Telephone: (305) 415-3416

[brian.ercole@morganlewis.com](mailto:brian.ercole@morganlewis.com)

3 LIEF CABRASER HEIMANN &  
4 BERNSTEIN, LLP

*Attorneys for Defendants YouTube, LLC and  
Google LLC*

5 By: /s/ Lexi J. Hazam

LEXI J. HAZAM

6 LIEFF CABRASER HEIMANN &  
7 BERNSTEIN, LLP

275 BATTERY STREET, 29TH FL

8 SAN FRANCISCO, CA 94111-3339

Telephone: 415-956-1000

9 lhazam@lchb.com

COVINGTON & BURLING LLP

By: /s/ Gregory L. Halperin

Greg Halperin, *pro hac vice*

The New York Times Building

620 Eighth Avenue

New York, NY 10018-1405

Telephone: (212) 841-1166

Facsimile: (212) 841-1010

[ghalperin@cov.com](mailto:ghalperin@cov.com)

*Attorneys for Defendants Meta Platforms,  
Inc. f/k/a Facebook, Inc.; Instagram, LLC;  
Facebook Payments, Inc.; Facebook  
Operations, LLC; and Siculus, Inc.*

KIRKLAND & ELLIS LLP

By: /s/ Jessica Davidson

Jessica Davidson, *pro hac vice*

601 Lexington Avenue

New York, New York 10022

Phone: (212) 341-7597

[jessica.davidson@kirkland.com](mailto:jessica.davidson@kirkland.com)

*Attorneys For Defendant Snap Inc.*

FAEGRE DRINKER LLP

By: /s/ Andrew Campbell

Andrew L. Campbell, pro hac vice

300 N. Meridian Street, Suite 2500

Indianapolis, Indiana 46204, USA

Phone: +1 317 237 0300

Fax: +1 317 237 1000

andrew.campbell@faegredrinker.com

*Attorneys for Defendants TikTok Inc. and  
ByteDance Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 1, 2025, a true and correct copy of STIPULATION was served upon the following by email:

Lexi Hazam  
Lieff Cabraser Heimann & Bernstein LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Phone 415-956-1000  
Fax 415-956-1008  
lhazam@lchb.com

*Attorney for Plaintiffs*

By: /s/ Jesse S. Krompier  
Jesse S. Krompier (SBN 318760)

*Attorney for Defendants YouTube, LLC and  
Google LLC*